

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

PENNY GUETTI,	:	04-30027-MAP
MICHAEL GUETTI,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
GUY R. CARIDDI,	:	
CARIDDI AUTO AGENCY,	:	
KAREN SUMMER,	:	
JOHN DOE A/K/A "BUTCH",	:	
Defendants	:	Affidavit

State of Massachusetts
County of Hampden, SS:

Jason David Fregeau, Esq., being first duly sworn upon oath,
deposes and says:

1. I am making this affidavit based upon personal knowledge, and I am competent to testify in the matters stated below. I am the Trial Attorney for Plaintiffs in the matter of Guetti v. Adorette, et al., No. 04-30027-MAP. I have supervision and control of Plaintiff's legal documents and correspondence regarding this lawsuit. This affidavit is made in support of Plaintiff's opposition to Defendants' motion to dismiss for lack of jurisdiction in the above matter.

2. My rate is \$200.00 per hour. To my knowledge and understanding, this is the usual and customary rate for attorneys with my level of experience practicing in Springfield, Massachusetts.

3. Within the last month, one car fraud case of mine was settled in the hallway before trial and another car fraud case


went to trial and was won. In the first case, I expended \$29,680 in fees up to the date of trial. In the second case, I expended \$12,500 in fees through trial.

4. According to my contemporaneous, detailed fee records, my fees for this case, through to 1 p.m. today, are approximately \$5140.

5. Based upon the two matters identified above, my experience as a consumer advocate and litigator, and my perception of Defendants' attitude toward litigation, I expect my fees (without costs or expenses) to be approximately \$20,000 through trial in this matter.

Further affiant sayeth naught.

Signed under the pains and penalties of perjury on this 15th day of July, 2004.



Jason David Fregeau, Esq.